

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

J.G.,	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION FILE
vs.	:	
	:	NO. 1:20-cv-05233-SEG
NORTHBROOK INDUSTRIES,	:	
INC., D/B/A UNITED INN AND	:	
SUITES,	:	
	:	CONSENT MOTION
Defendant.	:	

**PLAINTIFF’S CONSENT MOTION FOR EXCESS PAGES FOR
PLAINTIFF’S REPLY BRIEF IN SUPPORT OF PLAINTIFF’S
SUPPLEMENTAL MOTION PURSUANT TO LR54.2, NDGa FOR
ATTORNEY’S FEES AND EXPENSES**

Plaintiff hereby moves, with **consent** of Defendant, for excess pages for Plaintiff’s Reply Brief in Support of Plaintiff’s Supplemental Motion Pursuant to LR54.2, NDGa for Attorney’s Fees and Expenses. (Doc. 255). In this consent motion, Plaintiff requests that the Court grant Plaintiff ten extra pages for Plaintiff’s reply brief (for a total of 25 pages). In support, Plaintiff states the following:

1.

On September 15, 2025, Plaintiff filed a Supplemental Motion Pursuant to LR54.2, NDGa for Attorney’s Fees and Expenses. (Doc. 255).

2.

On October 13, 2025, Defendant filed a Response in Opposition to Plaintiff's Supplemental Motion Pursuant to LR54.2, NDGa for Attorney's Fees and Expenses. (Doc. 268).

3.

The deadline for Plaintiff to file a reply to the same motion is November 10, 2025. (Doc.270).

4.

Plaintiff requests an extra ten pages (for a total of 25 pages) to respond to the several factual and legal issues raised by Defendant in its response about attorney's fees in this five-year litigation.

5.

Defendant has consented to Plaintiff's request for an extra ten pages.

6.

This is the first request Plaintiff has made for extra pages, and, therefore, Plaintiff respectfully requests that the Court grant the instant consent motion. The text of a proposed Consent Order is attached hereto as "Exhibit A."

WHEREFORE, Plaintiff respectfully requests that this Court grant the instant Consent Motion for the reasons set forth above.

(signature on following page)

Respectfully submitted this 10th day of November, 2025.

/s/ David H. Bouchard

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Attorneys for Plaintiff

CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing pleading has been prepared with a font and point selection approved by the Court in LR 5.1., NDGA. Specifically, the above-mentioned pleading was prepared using Times New Roman font of 14-point size.

Respectfully submitted,

/s/ David H. Bouchard

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing filing into the District's ECF System, which will automatically forward a copy to counsel of record in this matter.

Respectfully submitted this 10th day of November, 2025.

/s/ David H. Bouchard

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